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CNC CHARLESTON  
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STATEMENT OF BASIS FOR SOLID WASTE MANAGEMENT UNIT 179 CNC CHARLESTON  
SC  
1/6/2014  
RESOLUTION CONSULTANTS

## STATEMENT OF BASIS

### Charleston Naval Complex Installation Restoration Program Charleston, South Carolina

**Facility:** Charleston Naval Complex

**Unit Type:** SWMU 179

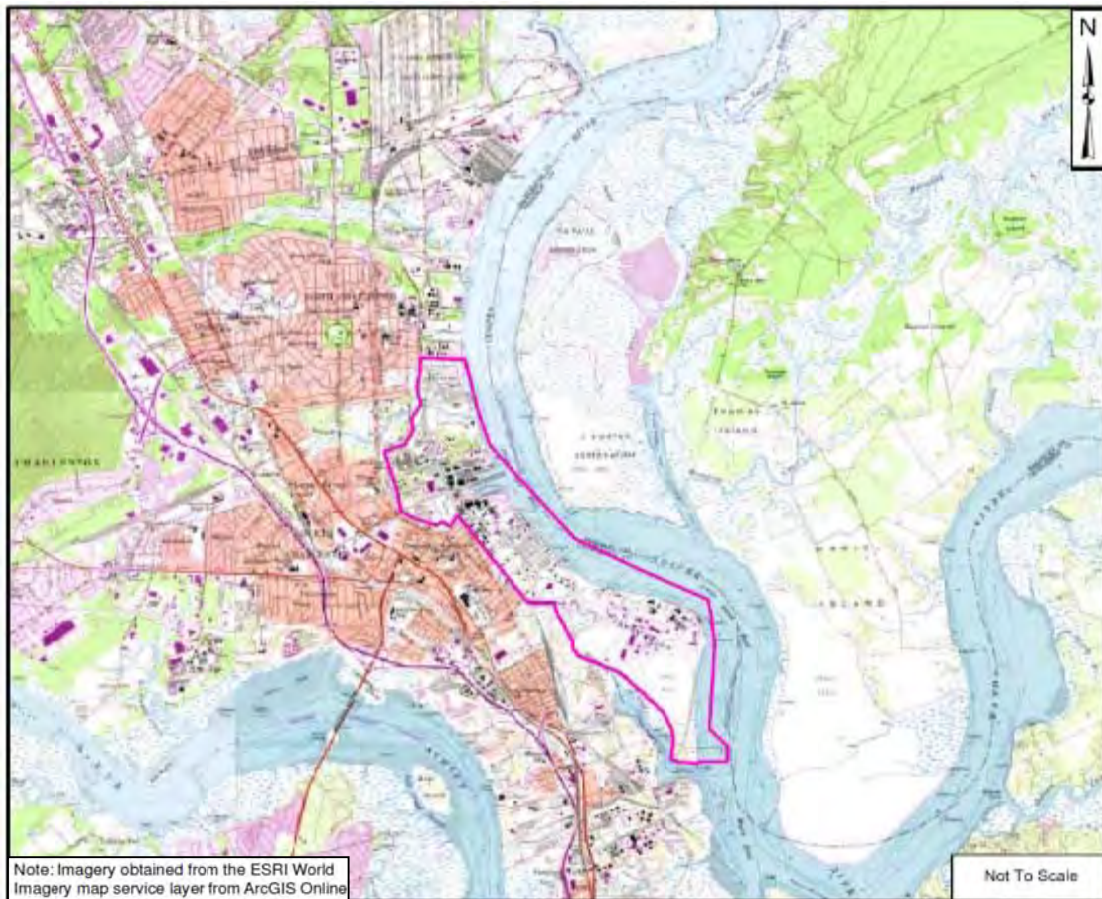
**Contaminants:** None

**Media:** Air

**Proposed Remedy:** Land Use Controls (LUCs)

## INTRODUCTION

The purpose of this Statement of Basis (SB) is to present the decision for Solid Waste Management Unit (SWMU) 179, which is Land Use Controls (LUCs), and to invite public comment on this proposed decision. This SB provides SWMU 179 background information and explains the reasons why LUCs are proposed. A facility location map is provided as Figure 1.



**Figure 1 – Charleston Naval Complex, Charleston, South Carolina**

Charleston Naval Complex (CNC) is located on the western bank of the Cooper River in Charleston Harbor at the confluence of the Ashley, Cooper, and Wando Rivers and their tributaries. CNC consists of 12 investigative zones (Zones A through L) for Resource

Conservation and Recovery Act (RCRA) corrective action processes. This SB presents the proposed remedy that LUCs are required for SWMU 179, located within Zone E. A site location map for SWMU 179 is provided as Figure 2.



**Figure 2 – SWMU 179 Site Location Map**

The CNC and South Carolina Department of Health and Environmental Control (SCDHEC) jointly developed the specific site remedy described herein and are issuing this SB as part of their public participation responsibilities under Section 7004(b) of the RCRA Title 42, United States Code Section 6974(b), and applicable state law. This document is intended to inform the general public of the proposed remedy for this site. SCDHEC will not approve the proposed remedy until the 45-day public comment period has ended and all information submitted during the public comment period has been reviewed and considered. SCDHEC may modify the proposed corrective action or select another action based on new information or public comments received on this SB. Therefore, the public is invited to review and comment on all alternatives, including any potential corrective measures that were not previously considered.

The information summarized in this SB can be found in greater detail in documents contained in the Information Repository for this facility. This SB does not replace those documents. Historical documents can be found in the administrative record at the Base Realignment and Closure Program Management Office (BRAC PMO) located in North Charleston, South Carolina and the SCDHEC office located in Columbia, South Carolina (addresses provided at the conclusion of this document). SCDHEC encourages the public to review these documents in order to gain a more thorough understanding of the site and the activities that have been conducted.

## **PROPOSED REMEDIES**

The recommended alternative for SWMU 179 is LUCs, which were recommended for application across Zone E in the March 2007 Corrective Measures Implementation Plan (CMI Plan). This remedy was selected by SCDHEC in their August 21, 2012 approval letter regarding the *Revised Zone E- SWMU 179 No Further Investigation Request* addressed to Mr. David Criswell of the BRAC PMO. Because the remedy of LUCs has already been selected and approved by SCDHEC, there is no further discussion included herein concerning other potential corrective measures alternatives or the terms of the decision criteria resulting in the selection of the proposed remedy. As a result, there is no “Summary of Alternatives” section or “Evaluation of Alternatives” section included in this SB.

## **SITE BACKGROUND**

SWMU 179 consists of a satellite accumulation area (SAA) located on the first floor of Building 222 in the shipping and receiving area. Building 222 was used for radiological control/monitoring and office/administration space. Building 222 was constructed in 1971 as a 25,940 square foot facility on a concrete slab with a red brick exterior and flat roof construction. The building consists of three floors above ground and a basement. Building 222 was under stringent controls and requirements of the Naval Nuclear Propulsion Program (NNPP) because it was used as a radiological repair facility. At the time of base closure (circa 1995), Building 222 was decommissioned under NNPP and released to the local community for unrestricted use with respect to NNPP radioactivity. Waste associated with the SSA included flammable wastes (solvents and paints), lead, cadmium, brass, and bronze. These hazardous wastes accumulated in the SAA of Building 222 until they were transferred to a permitted hazardous waste storage facility.

## **PREVIOUS INVESTIGATIONS**

The *Final RCRA Facility Assessment (RFA)* for Naval Base Charleston, including SWMU 179, was completed by Ensaf/Allen & Hoshall in 1995. The RFA presented SWMU 179 for a No Further Investigation (NFI) determination due to “the use of proper storage practice, the lack of evidence of release, and the limited migration pathways.” In 1996, four groundwater samples were collected using Geoprobe® equipment and methods in the area surrounding Building 222. All of the samples collected were analyzed for polychlorinated biphenyls (PCBs). There were no detections of PCBs in the samples. Based on the results of these samples, SWMU 179 was not included in the Zone E RCRA Facility Investigation (RFI) conducted in November 1997. SWMU 179 is not listed as a site requiring LUCs in any of the tables in the March 2007 CMI Plan, LUC Sites, Revision 1. SCDHEC review comments on this document do not mention SWMU 179. The CMI Plan does state, however, that LUCs should be applied across Zone E, including areas not specifically addressed in the report.

## **SUMMARY OF SITE RISKS**

The primary risks at SWMU 179, including flammable wastes (solvents and paints), lead, cadmium, brass, and bronze, were attributable to the SAA. Soil, groundwater, surface water,



and subsurface gas were considered unlikely pathways because of the containment provided by the building and the epoxy sealed concrete floor. Visual inspection of the floor revealed no cracking or deterioration in the vicinity of the SAA. The potential for migration via the air pathway existed primarily due to the presence of flammable volatile materials (solvents and paints). The flammable volatile materials formerly stored in the SAA have since been removed from Building 222, and no longer pose a potential risk for migration via the air pathway.

### **SCOPE OF CORRECTIVE ACTION**

LUCs are reasonable, appropriate and technically warranted for SWMU 179.

### **ANTICIPATED IMPACTS OF CLEANUP ON THE LOCAL COMMUNITY**

No significant impacts or exposure to the local community are anticipated with the proposed LUCs at SWMU 179.

### **STATUTORY AUTHORITIES**

This document is being issued in accordance with 40 Code of Federal Regulations (CFR), in compliance with federal hazardous waste management requirements. The Charleston Naval Complex Corrective Action Program is conducted under the authority of Sections 3004(u), 3004(v), 3005(c)(3), 3008(h), 3013, 6001, and 7003 of the RCRA (42 U.S.C. 6901 et. seq.) as amended by the Hazardous & Solid Waste Amendment of 1984 (HSWA) (Pub. L. No. 98-616, 98 Stat. 3221) and the Federal Facility Compliance Act of 1992 (FFCA) (Pub. L. 102-386, 106 Stat. 1505). This SB is part of the corrective action process and is a requirement of the Hazardous Waste Permit issued to Charleston Naval Complex by SCDHEC.

### **PUBLIC PARTICIPATION**

The final remedy selected for the site will be based on community acceptance. Public participation and comments are vital to a thorough evaluation. Documents generated following site investigation and remediation activities are available for public review.

A 45-day public comment period will be held (dates to be determined) during which time written comments will be accepted from the public. A public hearing will only be held at public request. If a hearing has been requested, information regarding the date, time, and location will be published in the *Post & Courier* newspaper.

Contact information is listed below for submission of comments regarding this Statement of Basis, request for public hearing, and/or for review of available documentation.

**Mr. David Criswell, P.E.**  
**Restoration Program Manager**  
Navy BRAC Program Management Office SE  
4130 Faber Place Drive Suite 202  
North Charleston, SC 29405  
(843) 743-2130  
Between the hours of 8:30 AM and 4:30 PM

or

**Ms. Meredith Amick, P.E.**  
**Bureau of Land and Waste Management**  
Division of Waste Management  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201  
(803) 898-0368  
Between the hours of 8:30 AM and 4:30 PM

## **REFERENCES**

SCDHEC, Letter to Mr. David Criswell. *Review of Revised Zone E- SWMU 179 No Further Investigation (NFI) Request, Charleston Naval Complex (CNC)*, August 21, 2012.

Tetra Tech, *Revised Zone E – SWMU 179 No Further Investigation (NFI) Request*, August 14, 2012.